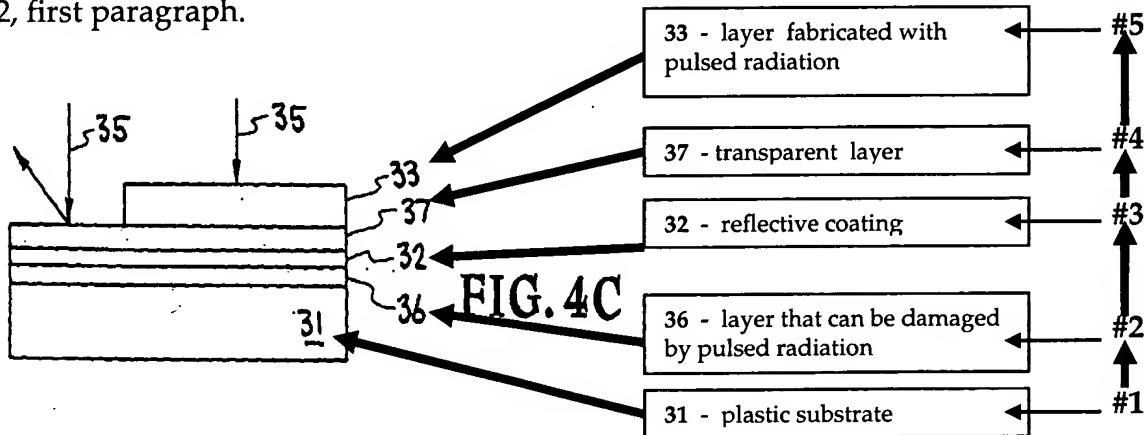


REMARKS/ARGUMENTS

The Office Action mailed February 9, 2005 has been carefully reviewed. Reconsideration of this application, as amended and in view of the following remarks, is respectfully requested. The claims presented for examination are: claims 1-13.

35 USC 112 REJECTION

In the Office Action mailed February 9, 2005, claims 1-13 were rejected under 35 U.S.C. 112, first paragraph, because there is no support in the embodiment of figure 4C for the elements in the listed order. Applicants have amended the claims to change the order of the elements." See the copy of FIG. 4C below with the elements of claim 1 shown in order as they appear in FIG. 4C. Applicants believe the claims now comply with the requirements of 35 U.S.C. 112, first paragraph.



Applicants' Invention Defined by Amended Claims 1-13

The invention defined by amended claims 1-13 is directed to a semiconductor device consisting of a specific combination of structural elements in a specific order. The order and the combination of the structural elements in amended claim 1 are:

- (1) a plastic substrate,

(2) a layer that can be damaged by said pulsed radiation, said layer that can be damaged by said pulsed radiation positioned above said plastic substrate and operatively connected to said layer fabricated with pulsed radiation,

(3) a narrowband reflective coating layer, said narrowband reflective coating layer positioned above said layer that can be damaged by pulsed radiation, positioned above said plastic substrate, and operatively connected to said layer that can be damaged by said pulsed radiation,

(4) a transparent layer located directly above said narrowband reflective coating layer, and

(5) a layer fabricated with pulsed radiation, said layer fabricated with pulsed radiation positioned above said plastic substrate.

35 USC 103 Rejection

In the Office Action mailed February 9, 2005 claims 1-13 were rejected under 35 USC 103(a) as allegedly being unpatentable over the Carey et al reference (U.S. Patent No. 5,817,550). Applicants have amended claims 1-13. Since claims 1-13 now appear in amended form the 35 USC §103(a) rejection in the Office Action mailed February 9, 2005 no longer applies.

Applicants respectfully submit that amended claims 1-13 presented for examination are patentable over the Carey et al reference. The factual inquiries set forth in Graham v. John Deere Co., 383 U.S. 1, 148 USPQ 459 (1966) that are applied for establishing a background for determining obviousness under 35 U.S.C. 103(a) include "Ascertaining the differences between the prior art and the claims at issue."

The Carey et al reference relates to fabricating silicon thin film transistors. The Carey et al reference shows and claims a method for fabricating silicon thin film transistors on a low-temperature plastic substrate comprising:

- (1) providing a low temperature plastic substrate,
- (2) forming a first insulating layer on the substrate,
- (3) forming a layer of amorphous silicon on the first insulating layer,
- (4) forming a second insulating layer on the amorphous silicon layer,
- (5) forming a metal layer on the second insulating layer,
- (6) removing a portion of the metal layer,
- (7) removing a portion of the second insulating layer so as to leave at least a portion of the silicon layer exposed,
- (8) doping and crystallizing the exposed silicon layer by pulsed laser processing,
- (9) providing a third insulating layer on the doped silicon layer and a remaining portion of the metal layer,
- (10) forming contact vias in the third insulating layer, and
- (11) forming source, gate, and drain contact and interconnect metalization in the vias.

Applicants' invention defined by amended claims 1-13 includes (A) the following structural elements, (B) the following combination of structural elements, and (C) the structural elements in the following specific order:

- (1) a plastic substrate,
- (2) a layer that can be damaged by said pulsed radiation,
- (3) a narrowband reflective coating layer,
- (4) a transparent layer, and
- (5) a layer fabricated with pulsed radiation.

Differences between the Carey et al reference and Applicants' invention defined by amended claims 1-13 include the fact that (A) structural elements of Applicants' amended claims 1-13 are not found in the Carey et al reference, (B)

the combination of structural elements in Applicants' amended claims 1-13 is not found in the Carey et al reference, and (C) the structural elements in the specific order of Applicant's amended claims 1-13 are not found in the Carey et al reference.

There is no obvious modification of the Carey et al reference that would produce the combination of elements of Applicants' amended claims. Thus, the Carey et al reference fails to support a rejection of the claims under 35 USC 103.

SUMMARY

The undersigned respectfully submits that, in view of the foregoing amendments and the foregoing remarks, the rejections of the claims raised in the Office Action dated February 9, 2005 have been fully addressed and overcome, and the present application is believed to be in condition for allowance. It is respectfully requested that this application be reconsidered, that the claims be allowed, and that this case be passed to issue. If it is believed that a telephone conversation would expedite the prosecution of the present application, or clarify matters with regard to its allowance, the Examiner is invited to call the undersigned attorney at (925) 424-6897.

Respectfully submitted,



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Livermore, California
Dated: May 5, 2005